

PRIVACY POLICY

SYDLORTECH, LLC

Last Updated: 1/24/25

SYDLORTECH, LLC (hereinafter referred to as, “the Company”) is committed to protecting your privacy. This Privacy Policy (hereinafter referred to as, “the Policy”) is designed to serve as an explanation of the Company’s information collection, use and sharing practices.

Unless otherwise stated, this Policy describes and governs the information collection, use and sharing practices of The Company with respect to your use of the services we provide (hereinafter referred to as, “Services”) on/or host on our servers.

Before you use or submit any information through or in connection with the Company or its Services, please carefully review this Privacy Policy. By engaging the Company or utilizing any part of its Services, you acknowledge and accept that your information will be collected, used and disclosed as outlined in this Policy.

OUR PRINCIPLES

The Company has designed this policy to be consistent with the following principles:

- I. Privacy policies should be readable and easy to find;
- II. Data collection, storage, and processing should be simplified as much as possible to enhance security, ensure consistency, and make the practices easy for users to understand; and
- III. Data practices should meet the reasonable expectations of users.

COLLECTION

The Company collects personal information necessary to ensure you receive the best product experience possible. This includes, but is not limited to, contact details and usage information. We collect information from you in multiple ways.

- I. *Information Provided Directly.* We will collect any information you provide to us. We may collect information in a variety of ways, including: (a) when an account is created; (b) when a purchase is made; and (c) when feedback is provided or we are contacted directly. This information may include but is not limited to you name, email address, phone number, mailing address, payment information and your geographic location.
- II. *Information that is Automatically Collected.*
 - a. *Device/Usage Information.* We may automatically collect certain information about the computer or devices (including mobile devices or tablets) you use to access the Services. As described further below, we may collect and analyze (a) device information such as IP addresses, location information (by country and city), unique device identifiers, IMEI and TCP/IP address, browser types, browser language, operating system, mobile device carrier information, and (b) information related to the ways in which you interact with the Services, such as referring and exit web pages and URLs, platform type, the number of clicks, domain names, landing pages, pages and content viewed and

the order of those pages, statistical information about the use of the Services, the amount of time spent on particular pages, the date and time you used the Services, the frequency of your use of the Services, error logs, and other similar information. As described further below, we may use third-party analytics providers and technologies, including cookies and similar tools, to assist in collecting this information.

- b. *Cookies and Other Tracking Technologies.* We also collect data about your use of the Services through the use of Internet server logs and online tracking technologies, like cookies and/or tracking pixels. A web server log is a file where website activity is stored. A cookie is a small text file that is placed on your computer when you visit a website, that enables us to: (a) recognize your computer; (b) store your preferences and settings; (c) understand the web pages of the Services you have visited and the referral sites that have led you to our Services; (d) enhance your user experience by delivering content specific to your inferred interests; (e) perform searches and analytics; and (f) assist with security administrative functions. Tracking pixels (sometimes referred to as web beacons or clear GIFs) are tiny electronic tags with a unique identifier embedded in websites, online ads and/or email, and that are designed to provide usage information like ad impressions or clicks, measure popularity of the Services and associated advertising, and to access user cookies. We may also use tracking technologies in our license buttons and/or icons that you can embed on other sites/services to track the website addresses where they are embedded, gauge user interaction with them, and determine the number of unique viewers of them. If you receive email from us (such as the CC newsletter, campaign updates, or other ongoing email communications from CC), we may use certain analytics tools, such as clear GIFs, to capture data such as whether you open our message, click on any links or banners our email contains, or otherwise interact with what we send. This data allows us to gauge the effectiveness of our communications and marketing campaigns. As we adopt additional technologies, we may also gather additional information through other methods. ******Please note that you can change your settings to notify you when a cookie is being set or updated, or to block cookies altogether. Please consult the “Help” section of your browser for more information. Please note that by blocking any or all cookies, you may not have access to certain features or offerings of the Services.******
- III. *Information from Third Parties.* To the extent permitted by law, we may also collect information from third parties, including public sources, social media platforms, and marketing and market research firms. Depending on the source, this information collected from third parties could include name, contact information, demographic information, information about an individual’s employer, information to verify identity or trustworthiness, and information for other fraud or safety protection purposes.

USAGE

We may use the information we collect from and about you to:

- I. Fulfill the purposes for which you provided it;
- II. Provide and improve the Services, including the development of new features or services, improving pre-existing structures and for technical and customer support;
- III. Process transactions;
- IV. Send you information about your interaction or transactions with us, account alerts, or other communications, such as newsletters to which you have subscribed;
- V. Process and respond to your inquiries or to request your feedback;
- VI. Conduct analytics, research, and reporting, including to synthesize and derive insights from your use of our Services;
- VII. Comply with the law and protect the safety, rights, property, or security of the Company, its Services, our users, and the general public;

VIII. Enforce our Terms of Use, including to investigate potential violations thereof.

Please note that we may combine information that we collect from you and about you (including automatically collected information) with information we obtain about you from our affiliates and/or non-affiliated third parties, and use such combined information in accordance with this Privacy Policy.

We may aggregate and/or de-identify information collected through the Services. We may use de-identified and/or aggregated data for any purpose, including without limitation for research and marketing purposes.

SHARING AND DISCLOSURES

We value your privacy and will never sell your information; however, to ensure you receive the best product experience possible, we may share your information within our company and with trusted partners as needed. The following enumerate instances in which we may share your information:

- I. *Service Providers.* We may disclose your information with third parties who perform services on our behalf, including without limitation, event management, marketing, customer support, data storage, data analysis and processing, and legal services.
- II. *Legal Compliance.* We may disclose your information if required to do so by law or on a good faith belief that such disclosure is permitted by this Privacy Policy or reasonably necessary or appropriate to effectuate legal compliance.
- III. *Business Transfers.* As we continue to develop our business, we may engage in certain business transactions, such as the transfer or sale of our assets. In such transactions, (including in contemplation of such transactions, e.g., due diligence) your information may be disclosed. If any of our assets are sold or transferred to a third party, customer information (including your email address) would likely be one of the transferred business assets.
- IV. *Affiliated Companies.* We may disclose your information with current or future affiliated companies.
- V. *Consent.* We may disclose your information to any third parties based on your consent to do so.
- VI. *Aggregate/De-Identified Information.* We may disclose de-identified or aggregated data for any purpose to third party advertisers, promotional partners and/or other similar entities.

LEGAL BASIS FOR PROCESSING DATA

Certain jurisdictions require companies detail the legal grounds relied upon to use or disclose information that can be directly linked to or used to identify users. To the extent that these laws apply, our grounds for processing such information are as follows:

- I. *To Honor our Contractual Commitments to Our Users.* Much of our processing of information is to meet our contractual obligations to provides the Services our users require.
- II. *Legitimate Interests.* In many cases, we handle information in furtherance of our legitimate interests in ways that are not overridden by the interests or fundamental rights and freedoms of our users, including but not limited to:
 - a. Customer Service;

- b. Marketing, advertising, or fundraising;
 - c. Protection of users, personnel, and property;
 - d. Managing user accounts;
 - e. Organizing and running events and programs;
 - f. Analyzing and improving our business;
 - g. Managing legal compliance.
 - h. The legitimate interests of our users and business partners.
- III. *Legal Compliance.* We may need to use and disclose information to comply with legal obligations.
- IV. *Consent.* Where required by law, and where legally permissible, we process information on the basis of consent. Where we handle your information on the basis of consent, you have the right to withdraw it in accordance with applicable law.
- V. *Online Analytics.* We may use third-party web analytics services (such as Google Analytics) on our Services to collect and analyze the information discussed above, and to engage in auditing, research, or reporting. The information (including your IP address) collected by various analytics technologies described in the “Cookies and Other Tracking Technologies” section above will be disclosed to or collected directly by these service providers, who use the information to evaluate your use of the Services, including by noting the third-party website from which you arrive to our Site, analyzing usage trends, assisting with fraud prevention, and providing certain features to you. To prevent Google Analytics from using your information for analytics, you may install the official Google Analytics Opt-out Browser Add-on.

GDPR AND EU DATA SUBJECT RIGHTS

Individuals in the European Economic Area (“EEA”) and other jurisdictions have certain legal rights with respect to the collection and use of their information through the Services. These rights include:

- I. *Right of Access.* You have the right to obtain confirmation of whether we hold certain information about you and to request a copy of that information.
- II. *Right to Rectify.* You can request the correction or updating of any inaccurate or incomplete personal information we hold about you.
- III. *Right to Object.* You have the right to object to the processing of your personal data on specific grounds, such as for marketing purposes or where we rely on legitimate interests.
- IV. *Right to Withdraw Consent.* Where we process your information based on your consent, you have the right to withdraw that consent at any time.
- V. *Right to Complain.* If you believe that your data protection rights have been violated, you have the right to lodge a complaint with the relevant supervisory or legal authority.

To exercise any of these rights or if you have any questions about how we handle your data, please email us at info@sydlortech.com. We are committed to responding to your requests promptly and within the timeframes required by GDPR. If necessary, the response time may be extended in certain circumstances.

INTERNATIONAL TRANSFERS

As described above in the *Disclosures* section above, we may share your information with trusted service providers or business partners in countries other than your country of residence in

accordance with applicable law. This means that some of your information may be processed in countries that may not offer the same level of protection as the privacy laws of your jurisdiction. By providing us with your information, you acknowledge any such transfer, storage or use and understand the same.

If we provide any information about you to any third parties information processors located outside of the EEA, we will take appropriate measures to ensure such companies protect your information adequately in accordance with this Privacy Policy and other data protection laws to govern the transfers of such data.

DATA SECURITY

The Company is committed to your security. We have implemented technical, physical, and organizational security measures to protect against the loss, misuse, and/or alteration of your information. These safeguards vary based on the sensitivity of the information that we collect and store. However, we cannot and do not guarantee that these measures will prevent every unauthorized attempt to access, use, or disclose your information since despite our efforts, no Internet and/or other electronic transmissions can be completely secure.

DATA RETENTION

The Company retains the information we collect for as long as necessary to fulfill the purposes set forth in this Privacy Policy or as long as we are legally required or permitted to do so. Information may persist in copies made for backup and business continuity purposes for additional time.

THIRD PARTY LINKS AND SERVICES

The Services may contain links to third-party websites (e.g., social media sites like Facebook and Twitter), third-party plug-ins (e.g., the Facebook “like” button and Twitter “follow” button), and other services. If you choose to use these sites or features, you may disclose your information not just to those third-parties, but also to their users and the public more generally depending on how their services function. The Company is not responsible for the content or privacy practices of such third-party websites or services. The collection, use and disclosure of your information will be subject to the privacy policies of the third-party websites or services, and not this Privacy Policy. We encourage you to read the privacy statements of each and every site you visit.

AMENDMENTS TO POLICY

The Company will continue to evaluate this Privacy Policy as it updates and expands its Services, and reserves the right to make changes to the same accordingly. We will post any changes here and revise the date last updated. We encourage you to check this page periodically for updates to stay informed on how we collect, use and share your information. If we make any material changes to this Policy, we will provide you with notice as required by law.

CONTACT INFORMATION

For any questions or concerns regarding this Privacy Policy or our privacy practices, please contact us at info@sydlortech.com.